

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**NORMAN E. LACEY,**

**Plaintiff,**

**v.**

**CITY OF AUBURN,**

**Defendant.**

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**CASE NO: 3:06-CV-1145-MEF**

**DEFENDANT'S WITNESS LIST**

**COMES NOW** the Defendant City of Auburn and submits a list of witnesses as follows:

1. Steven A. Reeves  
Department of Human Resources  
City of Auburn  
Auburn, Alabama
2. B. Scott Cummings  
c/o CH2M/Hill  
Atlanta, Georgia
3. Eric Carson  
Assistant Water Resource Management Director  
The Water Works Board of the City of Auburn  
Auburn, Alabama
4. Mikel Thompson  
Sewer Manager  
City of Auburn  
Auburn, Alabama
5. Derek Godfrey  
Water Coordinator  
The Water Works Board of the City of Auburn  
Auburn, Alabama

6. Charles Howard  
Heavy Equipment Operator  
The Water Works Board of the City of Auburn  
Auburn, Alabama
7. Jill Holland  
Water Revenue Office Manager  
The Water Works Board of the City of Auburn  
Auburn, Alabama
8. Kathy Bullard  
Utility Data Base Coordinator  
The Water Works Board of the City of Auburn  
Auburn, Alabama
9. Rick McCarty  
Auburn Water Board  
Auburn, Alabama
10. Kyle Hildreth  
c/o City of Auburn  
Auburn, Alabama
11. Joseph Eckhart  
c/o Auburn Water Board  
Auburn, Alabama
12. Martin Squiers  
c/o Auburn Water Board  
Auburn, Alabama
13. Stephen Kukla  
c/o Auburn Water Board  
Auburn, Alabama
14. Earline Cobb  
City Clerk  
City of Auburn  
Auburn, Alabama
15. Nell Greer  
c/o City of Auburn  
Auburn, Alabama

16. Mayor Austin Caldwell  
c/o City of Demopolis  
Demopolis, Alabama
17. Michelle Wall  
Payroll and Benefit Coordinator  
City of Auburn  
Auburn, Alabama
18. Brian Cook  
c/o City of Demopolis  
Demopolis, Alabama
19. Paula Brain  
c/o City of Demopolis  
Demopolis, Alabama
20. Custodian of Records  
Professional Services Group  
14950 Heathrow Forest Parkway  
Houston, Texas 11032
21. Human Resources/Personnel Director  
Professional Services Group  
14950 Heathrow Forest Parkway  
Houston, Texas 11032
22. Custodian of Records  
City of Demopolis and/or Demopolis Water Board  
Demopolis, Alabama
23. Custodian of Records  
Kellogg, Brown & Root  
Houston, Texas
24. Human Resources/Personnel Director  
Kellogg, Brown & Root  
Houston, Texas
25. Payroll Clerk  
Kellogg, Brown & Root  
Houston, Texas

26. Custodian of Records  
Service Employees International, Inc.  
Dubai, UAE
27. Human Resources/Personnel Director  
Service Employees International, Inc.  
Dubai, UAE
28. Payroll Clerk  
Service Employees International, Inc.  
Dubai, UAE
29. Any person needed for rebuttal.
30. Any person needed for impeachment.
31. Any person needed to authenticate any document, record or trial exhibit.
32. Defendant reserves the right to use any witnesses listed by Plaintiff.
33. Defendant reserves the right to supplement this list if necessary.

/s/ *Randall Morgan*  
Randall Morgan [MORG8350]  
Attorney for Defendant City of Auburn

OF COUNSEL:  
HILL, HILL, CARTER, FRANCO,  
COLE & BLACK, P.C.  
425 South Perry Street  
Montgomery, Alabama 36104  
334-834-7600

**CERTIFICATE OF SERVICE**

I hereby certify the foregoing has been duly served on the following via E-Mail and U.S. Mail, properly addressed and first-class postage prepaid on this the 19<sup>th</sup> day of March, 2008:

Roderick E. Cooks, Esq.  
Winston Cooks, LLC  
The Penick Building  
319 17<sup>th</sup> Street North  
Birmingham, Alabama 35203

/s/ *Randall Morgan*

OF COUNSEL